Applicant: Wei Zhu et al. Attorney's Docket No.: 20296-0002US1 / OP050050; Serial No.: 10/565.352 Huawei Ref: 0310882US

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REMARKS

Claims 1-10 are pending for further examination.

Claims 1-10 were rejected as unpatentable over U.S. Patent No. 2003/0133412 (Iyer et al.) in view of U.S. Patent No. 2002/0191572 (Weinstein et al.).

Applicants respectfully request reconsideration.

Claim 1 recites that the MPLS table item managing module obtains "a specific egress port corresponding to the forwarding-relation table item based upon the next-hop IP address." This facilitates a continuous dynamic process that is performed as a packet travels hop-by-hop. The Office action acknowledges that the Iyer et al. application does not disclose the claimed feature, but alleges that the Weinstein et al. application discloses this feature. Applicants respectfully disagree.

The Weinstein et al. application does not disclose "obtaining... a specific egress port corresponding to the forwarding-relation table item based upon the next-hop IP address."

Instead, the Weinstein et al. application discloses the packet is sent to the outgoing interface, which is contained in the Next Hop Label Forwarding Entries (NHLFE). For example, the Weinstein et al. application discloses that

The incoming label is then replaced with the <u>outgoing label</u> in the MPLS packet and the packet is sent out to the outgoing interface . . . For label mapping purposes, Next Hop Label Forwarding Entries (NHLFE) are used at the LSRs. Each NHLFE contains the outgoing interface

(paragraph 66). Thus, the Weinstein et al. application discloses that the outgoing interface in each NHLFE is used; it does not disclose using a specific physical port based on a next-hop IP address.

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As further evidence that the next-hop IP address is not used, the Weinstein et al. application discloses that the NHLFE is generated from incoming labels. For example, the Weinstein et al. application discloses that "At each intermediate LSR, an Incoming Label Map (ILM) converts incoming labels into corresponding NHLFEs to converts [sic] the MPLS packets accordingly." (paragraph 66). Thus, the Weinstein et al. application discloses the NHLFE is generated from incoming labels; the NHLFE is not related to the next-hop IP address.

Applicants respectfully submit that the Weinstein et al. application does not disclose obtaining "a specific egress port corresponding to the forwarding-relation table item based upon the next-hop IP address." In addition, the Weinstein et al. application does not suggest or render obvious this feature.

Furthermore, claim 1 recites that "a node with a MPLS table item managing module" which creates "a forwarding-relation table." and adds "a forwarding-relation table item based upon the obtained information." In contrast, the Iyer et al. application does not disclose a node with an MPLS table item managing module. The Office action alleges that Figure 5 of the Iyer et al. application discloses "the creation of a label-switched path (LSP) on the global network." Figure 5, however, does not disclose that a MPLS table item managing module creates a forwarding-relation table. At most, it discloses creating a path of MPLS labels, but does not disclose creating a table from the MPLS labels.

In light of the foregoing remarks, Applicants request withdrawal of the rejection of claim 1 as unpatentable over the Iyer et al. application in view of the Weinstein et al. application.

Dependent claims 2-10 should be patentable at least for the reasons discussed above with respect to claim 1. Furthermore, the dependent claims recite additional features that make those claims independently patentable.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or

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other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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